

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

ROYCE SOLOMON, et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

AMERICAN WEB LOAN, INC., et al.,

Defendants.

Civil Action No. 4:17-cv-0145-HCM-RJK

CLASS ACTION

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF REVISED CLASS ACTION SETTLEMENT**

Plaintiffs Royce Solomon, Jodi Belleci, Michael Littlejohn, and Giulianna Lomaglio, on behalf of themselves and the proposed Settlement Class¹ (collectively, “Plaintiffs” or the “Settlement Class Representatives”), hereby move the Court pursuant to Fed. R. Civ. P. 23 for preliminary approval of the revised class action settlement. Plaintiffs also move for certification of a class for the purposes of the Settlement, appointment of Settlement Class Counsel and Settlement Class Representatives, and approval of the form and manner of Notice to the Settlement Class. Plaintiffs further request that the Court enter the Preliminary Approval Order filed herewith and set a Final Approval hearing for the final approval of the Settlement.

In support of this motion, Plaintiffs are filing contemporaneously with this motion a memorandum of law and, as Exhibit A thereto, the Revised Settlement Agreement and all supporting exhibits.

¹ Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Revised Settlement Agreement, dated March 31, 2021 (the “Revised Settlement Agreement”), attached as Exhibit A to the memorandum in support filed herewith.

Defendants and the Settled Objectors do not oppose the filing of this motion.

DATED: March 31, 2021

MICHIEHAMLETT

/s/ David W. Thomas

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Settlement Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ David W. Thomas

David W. Thomas